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Attorneys for Defendants
REPRO MEDIA and ARNO RUBEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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|---|-------------------------------------|
| LEE LAHTINEN in his capacity as Trustee of the SAN FRANCISCO LITHOGRAPHERS PENSION TRUST, |) No. C06-04047 (MEJ) |
| |) |
| Plaintiff, |) STIPULATION AND [PROPOSED] |
| |) ORDER CONTINUING CASE |
| |) MANAGEMENT CONFERENCE |
| v. |) |
| |) |
| REPRO MEDIA, a California Corporation; ARNO RUBEN, individually and doing business as REPRO MEDIA; ARNO RUBEN, individually, |) |
| |) |
| Defendants. |) |

Plaintiff Lee Lahtinen, in his capacity as Trustee of the San Francisco Lithographers Pension Trust ("Plaintiff"), and Defendants Repro Media, a California Corporation, Arno Ruben, individually and doing business as Repro Media, and Arno Ruben, individually ("Defendants"), through their respective counsel, hereby stipulate to and request that the Court continue the Initial Case Management Conference and related deadlines to September 13 or 20, 2007 at 10 a.m. in order to allow the parties time to continue and complete their discussions regarding a possible

1 resolution of this action without the necessity of further litigation time and expense.

2 1. Pursuant to the Court's Order Setting Initial Case Management Conference
3 and ADR Deadlines, the Initial Case Management Conference in this action was set for September
4 28, 2006. Pursuant to stipulation of the parties, on September 25, 2006 the Court issued an Order
5 continuing the Initial Case Management Conference to December 21, 2006 in view of Defendants'
6 very recent first appearance in the action and the parties' stated interest in exploring settlement
7 through direct discussions. Pursuant to a subsequent stipulation of the parties, the Court on
8 December 7, 2006 issued a further Order continuing the Initial Case Management Conference to
9 March 22, 2007 in order to afford the parties additional time to explore settlement of their dispute.
10 Pursuant to a further stipulation of the parties, the Court on March 13, 2007 issued a further Order
11 continuing the Initial Case Management Conference to May 31, 2007.

12 2. At the time the parties requested the most recent continuance of the Initial
13 Case Management Conference (to May 31, 2007), the parties anticipated that they might be able to
14 conclude their settlement discussions before the compliance dates for case management-related
15 activities. As of mid-March Defendants had provided certain information and documentation to
16 Plaintiff, Plaintiff had requested supplemental information, and Defendants had furnished the
17 requested information to Plaintiff, whose Board of Trustees was meeting at the end of March.
18 However, following the Board of Trustees meeting Plaintiff requested supplemental financial
19 information, which Defendants have just provided to Plaintiff's counsel and Plaintiff has not yet
20 had time to evaluate.

21 3. On May 9, 2007 counsel for the parties conducted a telephone meet and
22 confer regarding an ADR process and preparation of the case management statement and Rule
23 26(f) report. In the course of their discussion of ADR it emerged that Plaintiff's counsel and her
24 client will likely have additional questions for Defendants regarding the most recent information
25 and documents provided to them before they will be in a position to discuss that information and a
26 possible resolution of this action with Plaintiff's Board of Trustees. Answering further questions
27 from Plaintiffs will likely require Defendants additional time to obtain information from their

1 outside accounting firm. The parties agree that the information that they are exchanging is also
2 material to preparation for an ADR process should direct negotiations for a settlement fail.

3 4. The parties agree that additional time is needed to permit the further
4 exchange of information and exploration of settlement. Counsel for the parties have discussed a
5 possible continuance of the Initial Case Management Conference for a period of 60 to 90 days.
6 However, due to scheduling of other matters, client availability and vacations, an August date for
7 the continued Case Management Conference is not feasible. The parties believe that an extension
8 of the conference date to September will afford them the time they need to continue and conclude
9 informal discovery and direct discussions regarding a possible resolution of this action without the
10 necessity of further litigation time and expense.

11 5. As noted above, there have been three previous continuations of the Initial
12 Case Management Conference and related case management activities.

13 6. The parties expect that the requested extension of the date for the Initial
14 Case Management Conference will have no adverse effect on the schedule for the case. No trial
15 date or other deadlines have yet been set. The requested extension may facilitate the resolution of
16 the parties' dispute, and will at a minimum enable the parties to exchange additional information
17 about their respective positions that may streamline case management.

18 Therefore, Plaintiffs and Defendants, through their respective counsel, stipulate and
19 agree as follows:

20 1. The Initial Case Management Conference date of May 31, 2007 and related
21 deadlines are vacated.

22 2. The Initial Case Management Conference date is extended to September 13
23 or 20, 2007 at 10:00 a.m.

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1 3. Related deadlines for ADR and case management activities are extended
2 accordingly, as provided in the Court's Order Setting Initial Case Management Conference and
3 ADR Deadlines.

4
5 Dated: May 9, 2007

6 WEINBERG, ROGER & ROSENFELD
7 A Professional Corporation

8 By: *Linda Baldwin Jones*
9 LINDA BALDWIN JONES
 Attorneys for Plaintiffs

10 Dated: May __, 2007

11 LITTLER MENDELSON
12 A Professional Corporation

13 By: _____
14 NANCY L. OBER
 Attorneys for Defendants

3. Related deadlines for ADR and case management activities are extended accordingly, as provided in the Court's Order Setting Initial Case Management Conference and ADR Deadlines.

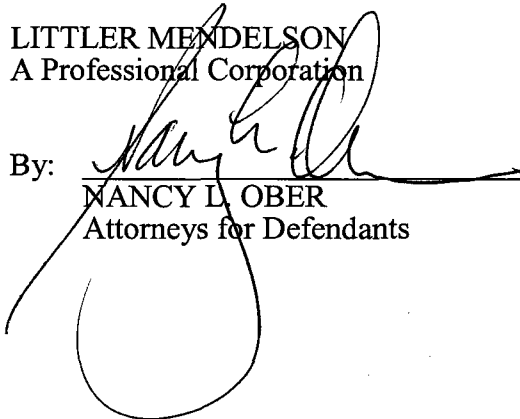
Dated: May __, 2007

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: _____
LINDA BALDWIN JONES
Attorneys for Plaintiffs

Dated: May 9, 2007

LITTLER MENDELSON
A Professional Corporation

By:  _____
NANCY D. OBER
Attorneys for Defendants

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference in this matter is rescheduled to September __, 2007 at 10 a.m.

Dated: _____

THE HONORABLE MARIA ELENA JAMES
UNITED STATES DISTRICT JUDGE

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